

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

EARL PARRIS, JR., Individually, )  
and on Behalf of a Class of Persons )  
Similarly Situated, )  
 )  
Plaintiff, )  
 )  
City of SUMMERTOWN, )  
GEORGIA, ) Case No.: 4:21-cv-00040-TWT  
 )  
 )  
Intervenor-Plaintiff, )  
 )  
 )  
v. )  
 )  
3M COMPANY, et al. )  
 )  
 )  
Defendants. )

**PULCRA CHEMICALS, LLC'S RESPONSE TO  
CITY OF SUMMERTOWN, GEORGIA'S  
AMENDED COMPLAINT IN INTERVENTION**

In accordance with the Court's February 16, 2023 Order [ECF 349],  
Defendant Pulcra Chemicals, LLC, in response to the City of Summerville,  
Georgia's Amended Complaint in Intervention [ECF 351], hereby incorporates its  
defenses and responses to Plaintiff's Second Amended Individual and Class Action  
Complaint [ECF 290] as if fully restated herein and is not required to file an  
Answer.

*[Signatures continued on next page]*

Respectfully submitted this 28<sup>th</sup> day of February, 2023.

*/s/ Robert D. Mowrey*  
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*Attorneys for Defendant Pulcra  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this 28th day of February, 2023, electronically filed the foregoing **PULCRA CHEMICALS, LLC'S RESPONSE TO CITY OF SUMMERTVILLE, GEORGIA'S AMENDED COMPLAINT IN INTERVENTION** using the CM/ECF system which will automatically send email notification of such filing to all registered CM/ECF users.

/s/ E. Peyton Nunez  
E. Peyton Nunez